

EXHIBIT 5

Page 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----*

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

vs.

RUDOLPH W. GIULIANI,

Defendant,

and

ANDREW H. GIULIANI,

Intervenor-Defendant.

-----*

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

vs.

RUDOLPH W. GIULIANI,

Defendant.

-----*

STENOGRAPHIC AND VIDEO-RECORDED

REMOTE VIRTUAL DEPOSITION OF

THEODORE C. GOODMAN

Tuesday, December 31, 2024

1:12 p.m.

<p style="text-align: right;">Page 2</p> <p>1 2 Tuesday, December 31, 2024 3 1:12 p.m. 4 5 T R A N S C R I P T of the stenographic and 6 video-recorded remote virtual deposition of THEODORE 7 C. GOODMAN, taken pursuant to Subpoena, held 8 virtually from multiple locations via Zoom, on 9 Tuesday, December 31, 2024, commencing at 10 approximately 1:12 p.m., stenographically recorded 11 by Josephine H. Fassett, a Registered Professional 12 Reporter, Certified Court Reporter, and Notary 13 Public of the states of New York and New Jersey. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 2 REMOTE APPEARANCES (cont'd.): 3 COUNSEL FOR THE WITNESS THEODORE C. GOODMAN: 4 BY: DAVID WOLKINSON, ESQ. dwolkinson@gmail.com 5 6 ALSO PRESENT REMOTELY: 7 HOWARD BRODSKY, Videographer 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 2 REMOTE APPEARANCES: 3 COUNSEL FOR THE PLAINTIFFS: 4 WILLKIE FARR & GALLAGHER LLP 5 1875 K Street, N.W. 6 Washington, D.C. 20006 7 202.303.1016 8 BY: J. TYLER KNOBLETT, ESQ. 9 tknoblett@willkie.com 10 MERYL GOVERNSKI, ESQ. 11 mgovernski@willkie.com 12 MAGGIE MacCURDY, ESQ. 13 mmaccurdy@willkie.com 14 15 COUNSEL FOR THE DEFENDANT: 16 CAMMARATA & DeMEYER P.C. 17 456 Arlene Street 18 Staten Island, New York 10314 19 718.447.0020 20 BY: JOSEPH M. CAMMARATA, ESQ. 21 joe@cdlawpc.com 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 2 -----INDEX----- 3 WITNESS PAGE 4 THEODORE C. GOODMAN 5 By Mr. Knoblett 9 6 7 8 -----EXHIBITS----- 9 EXHIBIT DESCRIPTION PAGE 10 Exhibit 1 Subpoena to Testify at a 20 11 Deposition in a Civil Matter 12 Exhibit 2 Subpoena to Produce Documents, 27 13 Information, or Objects or to 14 Permit Inspection of Premises in 15 a Civil Action 16 Exhibit 3 Court Order dated December 14, 33 17 2024 18 Exhibit 4 Tweet dated July 19, 2023 69 19 Exhibit 5 Tweet dated July 2, 2023 92 20 Exhibit 6 Tweet dated July 17, 2024 92 21 Exhibit 7 Tweet dated November 15, 2024 103 22 Exhibit 8 Video-audio clip 103 23 Exhibit 9 Tweet dated December 30, 2024 122 24 Exhibit 10 Tweet dated November 27, 2024 136 25 Exhibit 11 Calendar 150</p>

2 (Pages 2 - 5)

<p style="text-align: right;">Page 38</p> <p>1 GOODMAN</p> <p>2 I could review my paystubs. It's, it's -- I'm not</p> <p>3 actually, I'm not actually specifically familiar</p> <p>4 with how, you know, that business side of things.</p> <p>5 I receive a paycheck every month. I'm on what I</p> <p>6 would consider a retainer, independent contract.</p> <p>7 He allows me to do other projects if I have people</p> <p>8 that want to hire me for other things. So I</p> <p>9 believe I'm an independent contractor and I</p> <p>10 receive a monthly retainer.</p> <p>11 Q. Okay. You just said you have paystubs;</p> <p>12 is that right?</p> <p>13 A. I think it's all electronic, so I don't</p> <p>14 know if I have physical paystubs, no.</p> <p>15 Q. If I ask, would you be able to, you</p> <p>16 know, access them?</p> <p>17 A. I'd be, I'd be willing to look. I don't</p> <p>18 know how long it would take, but I'd be willing to</p> <p>19 go look and tell you who is, you know, who's</p> <p>20 actually pay -- you know, what the name is on the</p> <p>21 checks, if that's what you're asking, if that's</p> <p>22 what you're requesting, I could get back to you on</p> <p>23 that, yes.</p> <p>24 Q. Okay. But you have access to the</p> <p>25 paystubs, right?</p>	<p style="text-align: right;">Page 40</p> <p>1 GOODMAN</p> <p>2 A. I'm just asking for --</p> <p>3 Q. Okay. What efforts did you take to look</p> <p>4 for documents that were responsive to the document</p> <p>5 requests you received?</p> <p>6 A. Again, didn't have legal counsel and</p> <p>7 didn't believe I had any documents that fit under</p> <p>8 the -- I didn't believe I had any documents and</p> <p>9 admittedly I had requested more time that would</p> <p>10 be -- that were necessary under the -- what I had</p> <p>11 been sent over.</p> <p>12 Q. Mr. Goodman, you just testified that it</p> <p>13 was your belief you didn't have any documents that</p> <p>14 were responsive; is that right?</p> <p>15 A. I don't believe I have any documents</p> <p>16 that, you know, would -- yeah.</p> <p>17 Q. But did you actually look to see if you</p> <p>18 had any responsive documents?</p> <p>19 A. I read what the order said and -- that's</p> <p>20 not a question of looking, right, it's just</p> <p>21 thinking -- did I physically look? I, again,</p> <p>22 right when I think, I don't think I have anything</p> <p>23 on this, so.</p> <p>24 Q. Did you physically look for --</p> <p>25 A. Sorry, it's kind of an interestingly</p>
<p style="text-align: right;">Page 39</p> <p>1 GOODMAN</p> <p>2 A. I don't believe so. I mean, I guess,</p> <p>3 right, legally I probably have access to them. I</p> <p>4 don't ask for them. So I'm wired money once a</p> <p>5 month to my -- that's how I receive my...</p> <p>6 Q. When you get the wire each month, do you</p> <p>7 know the entity that's named on there, like where</p> <p>8 you receive the money?</p> <p>9 A. At this time I couldn't tell you but,</p> <p>10 again, I'm sure I could go look.</p> <p>11 Q. How would you check?</p> <p>12 A. I'd probably just go to my bank, you</p> <p>13 know, history and I'm sure there's something that</p> <p>14 says, you know, money received and I could look at</p> <p>15 who, what that name or entity is.</p> <p>16 Q. Okay. Is there a reason why you didn't</p> <p>17 produce those documents in this case?</p> <p>18 A. Oh, I -- so, again, didn't have, didn't</p> <p>19 have legal counsel, requested more time and --</p> <p>20 that's my answer.</p> <p>21 Q. But you have access to that now?</p> <p>22 A. Again, what is the relevance of that, of</p> <p>23 the --</p> <p>24 Q. Mr. Goodman, I'm the one asking</p> <p>25 questions.</p>	<p style="text-align: right;">Page 41</p> <p>1 GOODMAN</p> <p>2 worded question and I don't know how to answer.</p> <p>3 Q. Did you physically look for documents,</p> <p>4 Mr. Goodman?</p> <p>5 A. Did I --</p> <p>6 MR. WOLKINSON: What does that mean to</p> <p>7 physically look?</p> <p>8 MR. KNOBLETT: Let me strike that.</p> <p>9 I'll rephrase it.</p> <p>10 Q. Did you take any efforts when you saw</p> <p>11 the document requests that we sent you, did you</p> <p>12 take any efforts to actually look for documents</p> <p>13 that were responsive?</p> <p>14 A. Did I take any effort to look for that</p> <p>15 were responsive? I, I took -- did I take any</p> <p>16 effort? I, I -- I intended and will continue to</p> <p>17 do my best to adhere to all court orders.</p> <p>18 Q. Mr. Goodman, it's a yes-or-no question.</p> <p>19 I'll ask it again.</p> <p>20 Did you take any efforts to look for</p> <p>21 documents responsive to the document subpoena you</p> <p>22 received?</p> <p>23 A. Again, what my belief is, I don't have</p> <p>24 anything specific to that order, like I don't -- I</p> <p>25 guess I don't understand. Like I'm taking mental</p>

<p style="text-align: right;">Page 42</p> <p>1 GOODMAN</p> <p>2 effort to respond in a truthful -- in a truthful</p> <p>3 manner with the intention of abiding by all court</p> <p>4 orders.</p> <p>5 Q. Mr. Goodman, did you look through your</p> <p>6 email to see if there were any documents that were</p> <p>7 responsive to the document subpoena?</p> <p>8 A. I'm on my email account multiple times a</p> <p>9 day and I have had a long communication with you</p> <p>10 guys, right, and so --</p> <p>11 Q. Mr. Goodman, these are --</p> <p>12 A. I'm on my email every day.</p> <p>13 Q. Mr. Goodman, these are yes-or-no</p> <p>14 questions. Did you look through your email for</p> <p>15 documents? Yes or no.</p> <p>16 A. Have I looked through my email for</p> <p>17 documents? I mean, I consider that a very vague</p> <p>18 question. I mean yes. The answer is, of course</p> <p>19 I'm looking through my email for documents. For</p> <p>20 example, you know, I had to read these documents</p> <p>21 you guys were sending over. That's a long email</p> <p>22 chain.</p> <p>23 Q. Mr. Goodman, we sent you a document</p> <p>24 request subpoena. It had a list --</p> <p>25 A. Yes, and I --</p>	<p style="text-align: right;">Page 44</p> <p>1 GOODMAN</p> <p>2 Q. Okay. Mr. Goodman, if you wanted to</p> <p>3 find a particular email that you had sent or</p> <p>4 received from Mr. Giuliani, how would you do that?</p> <p>5 A. Well, usually we're sitting next to each</p> <p>6 other. Right. He'll send it to me and it will be</p> <p>7 at the top of my email list.</p> <p>8 Q. Okay. But let's say you want to find an</p> <p>9 email that is like from a month ago, how would you</p> <p>10 find that email?</p> <p>11 A. What kind of email is it? Am I</p> <p>12 searching a word. Right? Let's say I'm looking</p> <p>13 for someone's contact information, right, I would</p> <p>14 search that person's name in the search area,</p> <p>15 right. It depends on what kind email. What is my</p> <p>16 starting point when I'm going in? What's my</p> <p>17 reference point? Is it a date? Right? Am I</p> <p>18 looking for a specific email because of a date or</p> <p>19 am I looking for a specific email because of a</p> <p>20 name? Let's say I want to recall an email I sent</p> <p>21 about Green Bay Packers tickets, I would search</p> <p>22 Packers tickets. You get what I'm saying?</p> <p>23 Q. I understand. So there's a way for you</p> <p>24 to search your email with words?</p> <p>25 A. Yes. There's ways to search your</p>
<p style="text-align: right;">Page 43</p> <p>1 GOODMAN</p> <p>2 Q. -- of document requests. Do you</p> <p>3 understand that?</p> <p>4 A. Yes.</p> <p>5 Q. Did you look for documents that would --</p> <p>6 A. I had requested more time. I didn't</p> <p>7 have --</p> <p>8 Q. Please, Mr. Goodman, please let me</p> <p>9 finish my question and then you can respond.</p> <p>10 Did you look at those document requests</p> <p>11 and then go look for documents that would be</p> <p>12 responsive to those document requests? Yes or no,</p> <p>13 please.</p> <p>14 A. I didn't have any documents to like --</p> <p>15 honestly, I'm trying, I'm trying to answer this</p> <p>16 question. I don't really understand it. I'm</p> <p>17 trying to be truthful here. Right. All I can say</p> <p>18 is, I took the steps I believe had to be taken to</p> <p>19 abide by the court order and to -- with the</p> <p>20 intention of acting in good faith. I've requested</p> <p>21 more time. At this time, I think the illness may</p> <p>22 not have been a factor for this earlier. I think</p> <p>23 there's multiple dates that we're talking about,</p> <p>24 but I had requested more time. I didn't have an</p> <p>25 attorney and made some reasonable requests.</p>	<p style="text-align: right;">Page 45</p> <p>1 GOODMAN</p> <p>2 emails, yes.</p> <p>3 Q. Did you do that with regards to any of</p> <p>4 the document requests that we sent you? Yes or</p> <p>5 no.</p> <p>6 A. Did --</p> <p>7 Q. Let me strike that. Let me rephrase.</p> <p>8 For the document requests we sent you,</p> <p>9 did you go to the search area for your email and</p> <p>10 did you use keywords to search for documents</p> <p>11 responsive to our subpoena? Yes or no.</p> <p>12 A. I don't recall.</p> <p>13 Q. Okay. How do you not recall? Earlier</p> <p>14 you said that you --</p> <p>15 A. You're asking for a specific --</p> <p>16 Q. -- you believe you had any documents.</p> <p>17 A. Again, I just don't recall if at any</p> <p>18 point in the last month, right -- again, I use my</p> <p>19 email multiple times a day, and my intention has</p> <p>20 always been to abide by the court order, you know,</p> <p>21 with -- and to respect this court and the judge,</p> <p>22 and that's why I asked for more time. I didn't</p> <p>23 have legal counsel. And --</p> <p>24 Q. Mr. Goodman, you keep saying this, and</p> <p>25 you've said this over email that it's your</p>

12 (Pages 42 - 45)

<p style="text-align: right;">Page 46</p> <p>1 GOODMAN</p> <p>2 intention to abide by court orders; is that right?</p> <p>3 A. Yeah. Yes.</p> <p>4 Q. Sorry, we just need affirmative yeses or</p> <p>5 no on the record.</p> <p>6 Can you please describe the actual steps</p> <p>7 that you have taken to comply with the court's</p> <p>8 orders?</p> <p>9 A. Communicating with -- with opposing</p> <p>10 counsel, with you guys, explaining my situation at</p> <p>11 numerous times. Asking for reasonable extensions.</p> <p>12 I'm not asking for five months here.</p> <p>13 Explaining why specifically, whether</p> <p>14 it's because I didn't have legal counsel or I was</p> <p>15 facing a severe illness. And in each email I am</p> <p>16 pleasant, I am respectful, I am professional, and</p> <p>17 I try to explain myself.</p> <p>18 And I put on the record, right, the</p> <p>19 respect I have for this, for the court, and</p> <p>20 wanting to adhere to the court orders and</p> <p>21 explaining why I at times was having -- you know,</p> <p>22 explaining why I felt I just needed more time to</p> <p>23 comply.</p> <p>24 Q. Okay. Is there anything else you can</p> <p>25 think of that you did to comply with -- to attempt</p>	<p style="text-align: right;">Page 48</p> <p>1 GOODMAN</p> <p>2 today. Does that answer -- I mean, like I'm</p> <p>3 trying to explain, right, Tyler, I mean, I'm going</p> <p>4 to keep answering the same way.</p> <p>5 Q. Okay. Understood.</p> <p>6 So you said you obtained legal counsel,</p> <p>7 is that Mr. Wolkinson?</p> <p>8 A. Yes.</p> <p>9 Q. When did you retain --</p> <p>10 A. That's yesterday. Just yesterday. So,</p> <p>11 again, I am like -- yes, just yesterday.</p> <p>12 Q. So just so it's clean for the record.</p> <p>13 When did you retain Mr. Wolkinson as your</p> <p>14 attorney?</p> <p>15 A. Yesterday.</p> <p>16 Q. Why didn't you retain him as your</p> <p>17 attorney earlier?</p> <p>18 A. Why didn't -- I'm sorry, what do you</p> <p>19 mean?</p> <p>20 Q. Mr. Goodman --</p> <p>21 A. Again, I was facing a serious illness.</p> <p>22 I had communicated with you guys. I was thinking,</p> <p>23 look, they're professional. These guys are</p> <p>24 professionals, they'll understand, you know, we'll</p> <p>25 give him some more time and I -- you know, I was a</p>
<p style="text-align: right;">Page 47</p> <p>1 GOODMAN</p> <p>2 to comply with the court's orders?</p> <p>3 A. Communicating with multiple attorneys,</p> <p>4 right, with you guys. Obtaining legal</p> <p>5 representation. And thinking back to whether I</p> <p>6 would have any documents relating to the order and</p> <p>7 not believing that I had the specific documents.</p> <p>8 But also, but also, you know, but also requesting</p> <p>9 additional time for legal counsel and to make</p> <p>10 sure, right. And so, again, that's -- yeah, so I</p> <p>11 mean, I'm answering your question.</p> <p>12 Q. Is there anything else that you haven't</p> <p>13 mentioned that you did to comply with the court's</p> <p>14 orders?</p> <p>15 A. Anything that I haven't mentioned?</p> <p>16 Again, I'd want to spend some time to think about</p> <p>17 it, see if, you know -- again, I...</p> <p>18 Q. As you sit here today, can you think of</p> <p>19 anything else?</p> <p>20 A. Again, not believing I had documents</p> <p>21 relating to this but wanting to make sure of that</p> <p>22 by obtaining legal counsel and by communicating</p> <p>23 with you guys for additional time, you know,</p> <p>24 that's kind of -- that's my answer. I guess I</p> <p>25 don't understand specifically. I mean, I'm here</p>	<p style="text-align: right;">Page 49</p> <p>1 GOODMAN</p> <p>2 little surprised that that wasn't the position of</p> <p>3 opposing counsel and so I -- you know, in the</p> <p>4 meantime I went out and spoke with David to ensure</p> <p>5 that I am abiding by all court orders, and having</p> <p>6 legal counsel is important. And so, again, I was</p> <p>7 communicating with you guys multiple reasons why I</p> <p>8 had requested a reasonable amount of more time.</p> <p>9 You know, I'm not -- again --</p> <p>10 Q. I'm going to move to strike that answer</p> <p>11 as nonresponsive and, Mr. Goodman, Mr. Goodman,</p> <p>12 Mr. Goodman, please only respond to my questions.</p> <p>13 A. So what happens now? You move to strike</p> <p>14 it and is it stricken or how does this work?</p> <p>15 Q. I'm not here to testify today, your</p> <p>16 counsel can answer that.</p> <p>17 THE WITNESS: David?</p> <p>18 MR. WOLKINSON: He's just declaring it</p> <p>19 nonresponsive. It's not actually --</p> <p>20 THE WITNESS: But it's still going to</p> <p>21 be on -- what I said is going to be on the</p> <p>22 record?</p> <p>23 MR. WOLKINSON: Yes, it's on the</p> <p>24 record.</p> <p>25 A. And I totally disagree with you that's</p>

<p style="text-align: right;">Page 50</p> <p>1 GOODMAN</p> <p>2 nonresponsive. Again, you asked me why I hadn't</p> <p>3 hired David before yesterday, and I responded,</p> <p>4 look, I had asked for additional time and I --</p> <p>5 Q. Mr. Goodman --</p> <p>6 A. -- was working under the idea that you</p> <p>7 would give me that more time. You guys didn't,</p> <p>8 and I got legal counsel, and I'm here now with</p> <p>9 David, you know, has been on for less than</p> <p>10 24 hours.</p> <p>11 Q. Mr. Goodman. Mr. Goodman. You are here</p> <p>12 today to answer my questions. That's how a</p> <p>13 deposition works. If you do not answer my</p> <p>14 questions, then I will move to strike those</p> <p>15 answers because they are nonresponsive. Do you</p> <p>16 understand that?</p> <p>17 A. I don't understand what that means when</p> <p>18 you say strike, move to strike it.</p> <p>19 MR. WOLKINSON: Can you -- can we take</p> <p>20 a five-minute break? I just had somebody</p> <p>21 knocking at my door in the office.</p> <p>22 MR. KNOBLETT: Yes, we can take a</p> <p>23 break.</p> <p>24 MR. WOLKINSON: Okay.</p> <p>25 MR. KNOBLETT: That's fine.</p>	<p style="text-align: right;">Page 52</p> <p>1 GOODMAN</p> <p>2 inappropriate manner, please.</p> <p>3 Q. Mr. Goodman, when I ask questions that</p> <p>4 have a yes-or-no answer, you should answer with a</p> <p>5 yes or no.</p> <p>6 A. It's not -- Tyler, that's absolutely not</p> <p>7 the advice you would give your clients, right? If</p> <p>8 I don't understand the question or if my intention</p> <p>9 is to answer truthfully, it's not always as simple</p> <p>10 as, "Here's the question, now answer yes or no."</p> <p>11 Q. Mr. Goodman --</p> <p>12 A. Right? Do you agree?</p> <p>13 Q. -- you don't get, you don't get to</p> <p>14 hijack the deposition. When I answer questions --</p> <p>15 I ask you questions and you provide answers. Do</p> <p>16 you understand?</p> <p>17 A. I totally disagree with your</p> <p>18 characterization that I'm hijacking this</p> <p>19 deposition and, again, I disagree.</p> <p>20 MR. WOLKINSON: You can disagree, Ted.</p> <p>21 Ted, you can disagree with his</p> <p>22 characterization of how it's going, but you</p> <p>23 have to understand that it's a deposition,</p> <p>24 which is Tyler's deposition. He's here to</p> <p>25 answer -- ask questions and you're merely</p>
<p style="text-align: right;">Page 51</p> <p>1 GOODMAN</p> <p>2 THE VIDEOGRAPHER: The time is 1:58.</p> <p>3 We are off the record.</p> <p>4 (Off the record.)</p> <p>5 (Resumed.)</p> <p>6 THE VIDEOGRAPHER: The time is 2:05.</p> <p>7 We are on the record.</p> <p>8 BY MR. KNOBLETT:</p> <p>9 Q. Before I get into some more questions,</p> <p>10 Mr. Goodman, just so you know, we are entitled to</p> <p>11 seven hours of time for this deposition.</p> <p>12 A. I'd request that we break that -- I'd</p> <p>13 request --</p> <p>14 Q. Mr. Goodman, please let me, please let</p> <p>15 me finish what I'm saying.</p> <p>16 We are entitled under the Federal Rules</p> <p>17 to seven hours of time. If you want to use the</p> <p>18 next seven hours responding how you have, then we</p> <p>19 are entitled or we will move to keep the</p> <p>20 deposition open, which means we could depose you</p> <p>21 again, so --</p> <p>22 A. Why? What do --</p> <p>23 Q. Just so you understand that.</p> <p>24 A. How am I responding? Please, please</p> <p>25 expound on how you feel that I'm responding in an</p>	<p style="text-align: right;">Page 53</p> <p>1 GOODMAN</p> <p>2 here to answer them. You get that, right?</p> <p>3 THE WITNESS: Yes, I get that.</p> <p>4 MR. WOLKINSON: Okay. Okay.</p> <p>5 THE WITNESS: That's not what I'm --</p> <p>6 I'm not contesting that. What I'm simply</p> <p>7 stating, I'm explaining why it's not --</p> <p>8 MR. KNOBLETT: Mr. Goodman, let's get,</p> <p>9 let's get into, let's get into some</p> <p>10 questions. Okay?</p> <p>11 BY MR. KNOBLETT:</p> <p>12 Q. When did you first meet Mr. Giuliani?</p> <p>13 A. First meet? My first meeting with Mayor</p> <p>14 Rudy Giuliani was, I believe, October of 2018 when</p> <p>15 I was the communications director for a U.S.</p> <p>16 Senate candidate in Michigan named John James who</p> <p>17 is now a member of the U.S. House of</p> <p>18 Representatives. But I was John's communications</p> <p>19 director when he ran a senate race against Debbie</p> <p>20 Stabenow in 2018 and Mayor Giuliani had come to</p> <p>21 town in support of John, and I had met him, I</p> <p>22 believe, in Grand Rapids, Michigan. It was very</p> <p>23 short, right. He wasn't there to meet me. But</p> <p>24 that's the first time I had met Mayor Rudy</p> <p>25 Giuliani in person.</p>

<p style="text-align: right;">Page 54</p> <p>1 GOODMAN</p> <p>2 Q. Okay. And how did you come to work for</p> <p>3 Mr. Giuliani?</p> <p>4 A. So, again -- all right. I think part of</p> <p>5 your thing earlier was that I'm giving -- I'm</p> <p>6 answering and I'm taking too long with my answers.</p> <p>7 So through, again, multiple meetings and</p> <p>8 communications led me to working with Mayor</p> <p>9 Giuliani in October of 2022.</p> <p>10 Q. So you started working for him in</p> <p>11 October of 2022?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. How often do you speak with</p> <p>14 Mr. Giuliani?</p> <p>15 A. Quite often.</p> <p>16 Q. Would you say every day?</p> <p>17 A. Most days.</p> <p>18 Q. Okay. And how do you normally</p> <p>19 communicate with Mr. Giuliani?</p> <p>20 A. Talking.</p> <p>21 Q. So you're speaking with him in person;</p> <p>22 is that right?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. Do you ever email Mr. Giuliani?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 GOODMAN</p> <p>2 email account?</p> <p>3 A. I don't believe I have access to his</p> <p>4 email accounts on any of my devices.</p> <p>5 Q. Okay. Do you text Mr. Giuliani?</p> <p>6 A. I text him, I don't always get a text</p> <p>7 back.</p> <p>8 Q. That's true.</p> <p>9 A. Right? Hey, it's --</p> <p>10 Q. That could happen sometimes.</p> <p>11 A. It can. Part of it's generational,</p> <p>12 Tyler. You know, we're younger. The mayor's</p> <p>13 young as well. We're not saying he's old, right,</p> <p>14 but I do think some of it is generational, right.</p> <p>15 20-year-olds are texting now, they don't</p> <p>16 even talk on the phone, they're afraid to be on</p> <p>17 the phone.</p> <p>18 Q. I understand. Let's keep it to the</p> <p>19 questions. It's New Year's Eve, I don't want to</p> <p>20 waste anyone's time.</p> <p>21 When you text Mr. Giuliani, do you know</p> <p>22 the number that you text?</p> <p>23 A. Right now I could -- yeah. Yes, I'm</p> <p>24 texting his number.</p> <p>25 Q. Do you know --</p>
<p style="text-align: right;">Page 55</p> <p>1 GOODMAN</p> <p>2 Q. Okay. And is that from your Ted Goodman</p> <p>3 81 gmail.com account?</p> <p>4 A. Yes, yes. I would say my email</p> <p>5 communications with him are not -- are infrequent</p> <p>6 and often pertain to our show.</p> <p>7 Q. Okay. Does Mr. Giuliani read his email</p> <p>8 very often? Strike that. That's a vague</p> <p>9 question.</p> <p>10 Does Mr. Giuliani normally communicate</p> <p>11 over email?</p> <p>12 A. I'm sorry, can you -- can you get why</p> <p>13 that's still a little unclear?</p> <p>14 Q. Yeah, understood. Does Mr. Giuliani</p> <p>15 send his own emails?</p> <p>16 A. Like does he send his -- I believe so,</p> <p>17 yes.</p> <p>18 Q. Okay. And does Mr. Giuliani read his</p> <p>19 own emails?</p> <p>20 A. He's -- does he -- I believe that he has</p> <p>21 access to his email and does read his emails. I</p> <p>22 can't say to the frequency.</p> <p>23 Q. Okay.</p> <p>24 A. Yeah.</p> <p>25 Q. Do you have access to Mr. Giuliani's</p>	<p style="text-align: right;">Page 57</p> <p>1 GOODMAN</p> <p>2 A. You're asking me if I -- wait. Say</p> <p>3 that -- you're asking if I --</p> <p>4 Q. What is the phone number you normally</p> <p>5 text when you want to text him?</p> <p>6 A. I can't say it right now. If you want</p> <p>7 me to look at my phone, I can. I believe --</p> <p>8 Q. That's okay. That's okay.</p> <p>9 So when you email Mr. Giuliani, are</p> <p>10 those emails that you send, are they accessible on</p> <p>11 your phone?</p> <p>12 A. No.</p> <p>13 Q. How do you normally view those emails?</p> <p>14 A. Oh, my email. My email comes on my</p> <p>15 phone, yes, his email comes not on my phone.</p> <p>16 Q. Okay. And the email account that's on</p> <p>17 your phone, that would have emails that you've</p> <p>18 sent to Mr. Giuliani, right?</p> <p>19 A. Yeah. I usually am on -- this laptop</p> <p>20 issue I have, this is where I keep my -- I use</p> <p>21 email on there. I'd have to actually check to</p> <p>22 make sure that everything is up to date on my</p> <p>23 phone email.</p> <p>24 Q. So it's the email's --</p> <p>25 A. It's my laptop. It's this laptop right</p>

15 (Pages 54 - 57)

<p style="text-align: right;">Page 58</p> <p>1 GOODMAN</p> <p>2 here, yeah.</p> <p>3 Q. Sorry.</p> <p>4 A. Sorry.</p> <p>5 Q. Let's try not to crosstalk. I know it's</p> <p>6 hard over Zoom.</p> <p>7 So you can access your emails on your</p> <p>8 computer, right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And you can access your text on</p> <p>11 your phone, right?</p> <p>12 A. Yes.</p> <p>13 Q. Again, just verbal answers for the court</p> <p>14 reporter.</p> <p>15 When you email Mr. Giuliani, what's the</p> <p>16 email address that Mr. Giuliani uses?</p> <p>17 A. I believe it's</p> <p>18 truthandjusticeforyou@protonmail.com.</p> <p>19 Q. Are you aware of any other emails that</p> <p>20 Mr. Giuliani uses?</p> <p>21 A. I am not.</p> <p>22 Q. And that's the only one you know of?</p> <p>23 A. That's the only one, yeah, that's the</p> <p>24 email I use to communicate with him.</p> <p>25 Q. Okay. And do you have access to that</p>	<p style="text-align: right;">Page 60</p> <p>1 GOODMAN</p> <p>2 A. Thank you. Thank you. Thank you.</p> <p>3 Q. Okay. Okay. When was the last time --</p> <p>4 A. Yesterday.</p> <p>5 Q. So when was the last time you saw</p> <p>6 Mr. Giuliani in person?</p> <p>7 A. Yesterday.</p> <p>8 Q. And where was that?</p> <p>9 A. Florida.</p> <p>10 Q. Was that at his Palm Beach -- let me</p> <p>11 start off. Strike that.</p> <p>12 If I talk about the Palm Beach condo, do</p> <p>13 you understand that means his condominium</p> <p>14 apartment?</p> <p>15 A. His residence in Florida, yes.</p> <p>16 Q. Okay. Did you see him at the Palm Beach</p> <p>17 condo yesterday?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. How often are you at the Palm</p> <p>20 Beach condo?</p> <p>21 A. Often.</p> <p>22 Q. Would you say it's like a daily visit?</p> <p>23 A. We have a visit. We're working. We</p> <p>24 have a -- yes, I would say probably, yes, five,</p> <p>25 five, yeah. Yes.</p>
<p style="text-align: right;">Page 59</p> <p>1 GOODMAN</p> <p>2 proton email account?</p> <p>3 A. I do not.</p> <p>4 Q. Okay. When was the last time you spoke</p> <p>5 with Mr. Giuliani?</p> <p>6 A. When is the last time I spoke with him?</p> <p>7 Like verbally? Like in person?</p> <p>8 Q. Yes, in person.</p> <p>9 A. Yesterday.</p> <p>10 Q. Mr. Goodman, are you texting right now?</p> <p>11 A. I'm checking my phone, I'm not texting.</p> <p>12 Q. Mr. Goodman, please put your phone to</p> <p>13 the side when we're doing the deposition.</p> <p>14 A. You're asking me all these questions</p> <p>15 about my phone, what do you want me to do?</p> <p>16 Where's your phone, Tyler?</p> <p>17 Q. I'm the questioning attorney, so you</p> <p>18 don't get to ask me questions. Okay?</p> <p>19 A. You get your phone, I don't. Got it.</p> <p>20 Q. It's just for the court record, we'd</p> <p>21 very much appreciate if you'd put your phone to</p> <p>22 the side.</p> <p>23 A. And for the record, I put my phone --</p> <p>24 Q. You can look at it during breaks but not</p> <p>25 while I'm asking you questions.</p>	<p style="text-align: right;">Page 61</p> <p>1 GOODMAN</p> <p>2 Q. So five days a week; is that right?</p> <p>3 A. Give or take.</p> <p>4 Q. Okay. And you said you're working at</p> <p>5 the Palm Beach condo; is that right?</p> <p>6 A. We do our show often from his residence,</p> <p>7 yes.</p> <p>8 Q. Is there a studio at the Palm Beach</p> <p>9 condo?</p> <p>10 A. I mean, we do a live show from the --</p> <p>11 from his residence and you could, yeah, you could</p> <p>12 say there's a studio there with all the equipment</p> <p>13 and stuff that we have, yeah.</p> <p>14 Q. And you mentioned shows. Could you</p> <p>15 describe what shows Mr. Giuliani has today, like</p> <p>16 just, you know, currently?</p> <p>17 A. We have our 8 o'clock show, America's</p> <p>18 Mayor Live.</p> <p>19 Q. Is there any other shows?</p> <p>20 A. Well, we are actually currently</p> <p>21 transitioning what was the previous 7 o'clock</p> <p>22 show, so as of right now there's an 8 o'clock</p> <p>23 show.</p> <p>24 Q. Okay. And is that -- does that</p> <p>25 8 o'clock show have a different name?</p>

<p style="text-align: right;">Page 78</p> <p>1 GOODMAN</p> <p>2 answer.</p> <p>3 A. Is there a mediator? How does this</p> <p>4 work? So if I'm asking for a break, and you're</p> <p>5 saying you don't want to give me the break, who</p> <p>6 then determines if I get a break?</p> <p>7 MR. WOLKINSON: Ted, Ted, if you know</p> <p>8 the answer to question, you have to answer</p> <p>9 it. If you don't know, you don't know.</p> <p>10 THE WITNESS: I want to talk to my</p> <p>11 attorney in private.</p> <p>12 BY MR. KNOBLETT:</p> <p>13 Q. Mr. Goodman, when there's a question</p> <p>14 pending that is unanswered, then we do not take</p> <p>15 breaks. Once you answer the question --</p> <p>16 A. I can't put a monetary -- I'm answering</p> <p>17 it -- I can't put a specific monetary value. For</p> <p>18 example, in New York --</p> <p>19 Q. Mr. Goodman, how much money --</p> <p>20 A. -- I would stay with him, and you can't</p> <p>21 put a monetary value on that, so I'm not</p> <p>22 prepared --</p> <p>23 Q. Mr. Goodman, you discussed receiving</p> <p>24 paystubs earlier. You know how much --</p> <p>25 A. I did not. I said, when you said</p>	<p style="text-align: right;">Page 80</p> <p>1 GOODMAN</p> <p>2 that I receive monthly from the mayor.</p> <p>3 Q. How much money do you receive monthly as</p> <p>4 compensation, compensation from Mr. Giuliani?</p> <p>5 A. Again, I can't put -- I have to go back</p> <p>6 and calculate based off of a number of, you know,</p> <p>7 benefits and compensation that I received as part</p> <p>8 of my work with Mayor Giuliani.</p> <p>9 Q. Give me a --</p> <p>10 A. Month to month, for example.</p> <p>11 Q. Give me a ballpark. Give me a ballpark.</p> <p>12 How much -- today's the 31st. How much money --</p> <p>13 A. Under 10,000 -- under -- well, under</p> <p>14 15,000 a month.</p> <p>15 Q. Okay. Under 15,000 a month. How about,</p> <p>16 is it around 10,000 a month?</p> <p>17 A. I would say under 10,000 a month.</p> <p>18 Again, there's a number of factors that played</p> <p>19 here. Sorry, something just turned on in my room.</p> <p>20 Q. Is it around 5,000 a month?</p> <p>21 A. I can't, I can't -- again, month to</p> <p>22 month I can't get specific on that because of</p> <p>23 additional compensation, you know, whether it's</p> <p>24 certain deals through our show, right, that I</p> <p>25 receive, so that's...</p>
<p style="text-align: right;">Page 79</p> <p>1 GOODMAN</p> <p>2 paystubs, I said, I'm not sure what</p> <p>3 compensation --</p> <p>4 Q. Mr. Goodman, please let me finish my</p> <p>5 question.</p> <p>6 You said you received paystubs earlier.</p> <p>7 You get money that is put into some account or</p> <p>8 something; is that right?</p> <p>9 A. I am paid a monthly retainer, yes.</p> <p>10 Q. How much is your monthly retainer?</p> <p>11 A. Again, in addition to that -- and this</p> <p>12 is why I'm not answering this question. It's</p> <p>13 irrelevant.</p> <p>14 Q. Mr. Goodman, you have to answer this</p> <p>15 question because I asked it.</p> <p>16 A. And I'm telling you -- all right. So</p> <p>17 here's my answer. Okay. I have to answer. I</p> <p>18 cannot put a monetary value on, for example, in</p> <p>19 New York I would stay with the mayor --</p> <p>20 Q. Motion to strike this answer as</p> <p>21 nonresponsive.</p> <p>22 A. What? No, I disagree with that.</p> <p>23 Q. Mr. Goodman doesn't know how much money</p> <p>24 he makes from --</p> <p>25 A. Because that's not the full compensation</p>	<p style="text-align: right;">Page 81</p> <p>1 GOODMAN</p> <p>2 Q. Are those -- is that additional</p> <p>3 compensation, is that stipulated in the contracts</p> <p>4 that are associated with the show?</p> <p>5 A. Frankly, I don't believe I have a</p> <p>6 written contract with the mayor.</p> <p>7 Q. You don't have a written contract with</p> <p>8 Mr. Giuliani?</p> <p>9 A. I can't recall, I can't actually recall.</p> <p>10 Q. Do you have -- and I'll get to this</p> <p>11 later, but do you have a written contract with</p> <p>12 Standard USA, LLC?</p> <p>13 A. I believe that I may have like a</p> <p>14 2 percent interest in Standard USA. Again, I</p> <p>15 think that was brought up to me once and I haven't</p> <p>16 even heard the name since other than in the court</p> <p>17 proceedings, but I do believe I was given like a</p> <p>18 very small percentage of this new entity, but I'm</p> <p>19 not familiar with anything else in terms of the</p> <p>20 business operations.</p> <p>21 Q. Okay. So you're a part owner of one of</p> <p>22 Mr. Giuliani's companies; is that right?</p> <p>23 A. Again, I believe I was given a 2 percent</p> <p>24 interest. I mean, you can probably tell me if</p> <p>25 that's the case.</p>

21 (Pages 78 - 81)

<p style="text-align: right;">Page 82</p> <p>1 GOODMAN</p> <p>2 Q. Why were -- do you know why you were</p> <p>3 given -- do you know why you were given a</p> <p>4 2 percent interest?</p> <p>5 A. I do not.</p> <p>6 Q. What was the discussion around that?</p> <p>7 A. I don't recall. It was very short and I</p> <p>8 just said okay.</p> <p>9 Q. Who told you that you had a 2 percent</p> <p>10 ownership stake in Standard?</p> <p>11 A. I don't recall, but it would be either,</p> <p>12 you know, it would be one of -- it would be the</p> <p>13 mayor or Maria.</p> <p>14 Q. Okay. And do you know how much -- do</p> <p>15 you know if there's any other owners in Standard?</p> <p>16 A. I do not.</p> <p>17 Q. Do you have --</p> <p>18 A. I don't believe so but I don't know for</p> <p>19 sure.</p> <p>20 Q. Do you know if Mr. Giuliani is an owner</p> <p>21 of Standard?</p> <p>22 A. I do not. I believe so, though, but</p> <p>23 again, I don't -- but I'm not sure. I don't want</p> <p>24 to say these things without knowing. Again, I</p> <p>25 don't know these things, I'm not -- go ahead.</p>	<p style="text-align: right;">Page 84</p> <p>1 GOODMAN</p> <p>2 sponsorships?</p> <p>3 A. Do I get money personally from the</p> <p>4 sponsorships? In some cases I have received</p> <p>5 compensation for sponsorships, yes.</p> <p>6 Q. Do you receive that directly from the ad</p> <p>7 company?</p> <p>8 A. Through the show.</p> <p>9 Q. Okay. So --</p> <p>10 A. I mean -- sorry, yeah, go ahead.</p> <p>11 Q. The money you receive from these</p> <p>12 sponsorships, do you receive that money from</p> <p>13 Mr. Giuliani?</p> <p>14 A. I don't know if it goes through him and</p> <p>15 then to me or if it goes from the new sponsor to</p> <p>16 me, right, I'm not, I'm not on the business side</p> <p>17 of these things.</p> <p>18 Q. Do you know if it comes from one of</p> <p>19 Mr. Giuliani's companies?</p> <p>20 A. I don't, I'd have to look.</p> <p>21 Q. Okay.</p> <p>22 A. I don't believe so, but I'd have to</p> <p>23 look. I don't believe so, I'd have to look,</p> <p>24 though.</p> <p>25 Q. How often --</p>
<p style="text-align: right;">Page 83</p> <p>1 GOODMAN</p> <p>2 Q. Okay. When you were -- when you were</p> <p>3 given a 2 percent ownership stake in Standard USA.</p> <p>4 A. In the short conversation I said sure.</p> <p>5 I believe I signed a document and that was it.</p> <p>6 Q. Do you have access to that document?</p> <p>7 A. I do not.</p> <p>8 Q. Okay.</p> <p>9 A. I'm sure if I asked for it, I could.</p> <p>10 What do you mean access? If I asked for it, I'm</p> <p>11 sure I could get it.</p> <p>12 Q. So you could get it if you asked for it?</p> <p>13 A. I think. I don't know...</p> <p>14 Q. Okay. So you mentioned you sometimes</p> <p>15 get extra money from the show, can you -- could</p> <p>16 you elaborate, like what do you mean by that?</p> <p>17 A. Sponsorships.</p> <p>18 Q. Okay. And do you -- do you get like a</p> <p>19 monthly salary from Mr. Giuliani?</p> <p>20 A. I think we classified it as a retainer,</p> <p>21 didn't we?</p> <p>22 Q. I don't know. I'm asking you.</p> <p>23 A. Again, I believe I'm an independent</p> <p>24 contractor.</p> <p>25 Q. Do you get money personally from the</p>	<p style="text-align: right;">Page 85</p> <p>1 GOODMAN</p> <p>2 A. Well, it may, right. Again, if I bring</p> <p>3 in a sponsor, I don't know how the money gets to</p> <p>4 me, but it gets to me.</p> <p>5 Q. Is the money sent to you by check?</p> <p>6 A. Wire.</p> <p>7 Q. Wired to your checking --</p> <p>8 A. Have I received a check in the last two</p> <p>9 and a half years through my work with the mayor,</p> <p>10 I'd have to, I'd have to look back and see to</p> <p>11 answer that. I don't know for sure if I ever</p> <p>12 received a physical check for work related to</p> <p>13 Mayor Giuliani or the show that we served.</p> <p>14 Q. So when you receive payment it's direct</p> <p>15 deposit, right?</p> <p>16 A. I believe so, wire or direct deposit.</p> <p>17 Q. Okay.</p> <p>18 A. It might be the same thing.</p> <p>19 Q. Did you make more money in 2024 compared</p> <p>20 to 2023?</p> <p>21 A. Great question. I can't answer that</p> <p>22 right off the top of my head. Believe it or not,</p> <p>23 Tyler, I'm not in this for the money.</p> <p>24 Q. Have you received a raise this year?</p> <p>25 A. A raise? I don't believe so. As far as</p>

22 (Pages 82 - 85)

<p style="text-align: right;">Page 86</p> <p>1 GOODMAN</p> <p>2 my -- I don't believe so. I wouldn't count any as</p> <p>3 a raise.</p> <p>4 Q. Okay.</p> <p>5 A. That's, yeah, my work with the mayor.</p> <p>6 Q. Have you received a bonus of any kind?</p> <p>7 A. Have I received a bonus? I'd have to</p> <p>8 look back. I'd have to look back. Frankly, I'm</p> <p>9 not -- I don't check -- maybe it's my own fault --</p> <p>10 my finances on a day-to-day basis. I'd have to</p> <p>11 look.</p> <p>12 Q. Okay. Have you received a bonus in</p> <p>13 December of this month?</p> <p>14 A. Bonus December of this month?</p> <p>15 Q. Sorry. This December.</p> <p>16 A. I know, I know, I'm thinking.</p> <p>17 I don't think so, but I don't believe</p> <p>18 so, no.</p> <p>19 Q. So you're saying --</p> <p>20 A. Maybe -- I got a thousand dollars. I</p> <p>21 did get \$1,000, either Thanksgiving, maybe it was</p> <p>22 for Christmas, there was no discussion what that</p> <p>23 was for, but I would guess it was one of those,</p> <p>24 you know, related to one of those two holidays.</p> <p>25 Q. But that thousand dollars was separate</p>	<p style="text-align: right;">Page 88</p> <p>1 GOODMAN</p> <p>2 evasive here, Tyler. I can look and tell you who</p> <p>3 pays my -- this monthly wire, but right now I</p> <p>4 couldn't say, right, but it's -- yeah.</p> <p>5 Q. Okay.</p> <p>6 A. Does that make sense?</p> <p>7 Q. You testified a few minutes ago that you</p> <p>8 make somewhere around \$10,000 a month; is that</p> <p>9 right?</p> <p>10 A. Nope. I said under 10,000.</p> <p>11 Q. Okay. Under 10,000.</p> <p>12 A. This is my work with the mayor</p> <p>13 specifically.</p> <p>14 Q. Okay.</p> <p>15 A. With the mayor and the show. It's under</p> <p>16 10,000. And, again, I couldn't answer you</p> <p>17 specifically because -- well, I'm going to stop</p> <p>18 there.</p> <p>19 Q. Okay. How do you check how much money</p> <p>20 is in your checking account?</p> <p>21 A. An app on my phone I believe is usually</p> <p>22 how I do it.</p> <p>23 Q. Okay.</p> <p>24 A. I believe.</p> <p>25 Q. How often do you check that?</p>
<p style="text-align: right;">Page 87</p> <p>1 GOODMAN</p> <p>2 from your normal monthly salary?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. So would you consider that a</p> <p>5 bonus?</p> <p>6 A. I'd have to look back specifically if</p> <p>7 that was related to a speaking engagement or</p> <p>8 something, but as of right now I believe that was</p> <p>9 a holiday-related bonus.</p> <p>10 Q. Okay. So overall you're saying you</p> <p>11 don't really remember if you received a bonus this</p> <p>12 year?</p> <p>13 A. I'm not saying that, I'm saying I got a</p> <p>14 thousand dollars and as of right now we're sitting</p> <p>15 here I believe that was a bonus related to the</p> <p>16 holidays.</p> <p>17 Q. Okay. And do you remember who paid you</p> <p>18 the \$1,000?</p> <p>19 A. I believe it was the same -- whether</p> <p>20 it's the mayor or some entity, you know, that pays</p> <p>21 my monthly retainer.</p> <p>22 Q. Okay.</p> <p>23 A. I'm happy to go look at where -- I am</p> <p>24 happy to go look at the name, you know, where I'm</p> <p>25 getting my money from. I'm not trying to be</p>	<p style="text-align: right;">Page 89</p> <p>1 GOODMAN</p> <p>2 A. Honestly, for the last -- not that</p> <p>3 often, probably less than I should.</p> <p>4 Q. Okay. But you could go on your -- you</p> <p>5 could go on your phone and go on the app and you</p> <p>6 could see exactly how much money you were paid by</p> <p>7 Mr. Giuliani; is that right?</p> <p>8 A. I believe, I believe so.</p> <p>9 Q. Okay. And so you didn't do that in this</p> <p>10 case; is that right?</p> <p>11 A. Again, why would I have done that? I,</p> <p>12 again, have requested, again, more time so I could</p> <p>13 retain legal counsel and to ensure that I was</p> <p>14 adhering to the court order and I had requested</p> <p>15 more time.</p> <p>16 Q. Okay. Well, let's move on.</p> <p>17 Do you travel with Mr. Giuliani as part</p> <p>18 of your work?</p> <p>19 A. I do.</p> <p>20 Q. How often?</p> <p>21 A. So a few times a month, maybe.</p> <p>22 Q. And does -- is that travel usually by</p> <p>23 car, airline, can you describe it?</p> <p>24 A. Plane.</p> <p>25 Q. Plane.</p>

<p style="text-align: right;">Page 90</p> <p>1 GOODMAN</p> <p>2 A. And cars are involved, right, to get to</p> <p>3 the planes. Yeah.</p> <p>4 Q. Okay. And who books that travel?</p> <p>5 A. I believe Maria Ryan. For the most</p> <p>6 part.</p> <p>7 Q. Okay. And do you know how she pays for</p> <p>8 it?</p> <p>9 A. I do not.</p> <p>10 Q. Do you know if she uses her personal</p> <p>11 credit card?</p> <p>12 A. I do not.</p> <p>13 Q. Do you know if she uses a company card</p> <p>14 associated with one of Giuliani's businesses?</p> <p>15 A. I do not know.</p> <p>16 Q. Okay. How do you coordinate travel?</p> <p>17 A. Depends. If it's some trips I will --</p> <p>18 well, I don't usually coordinate travel, right.</p> <p>19 If it's something I put together, then I will</p> <p>20 provide the information and then it's coordinated</p> <p>21 and I get an email that's saying this is the time.</p> <p>22 This is your plane. Don't miss the plane. And</p> <p>23 then -- so I'm not really coordinating travel. I</p> <p>24 wouldn't describe that as my role.</p> <p>25 Q. So you have emails that show --</p>	<p style="text-align: right;">Page 92</p> <p>1 GOODMAN</p> <p>2 Q. Let me rephrase.</p> <p>3 Have you ever purchased tickets for</p> <p>4 travel that was with Mr. Giuliani?</p> <p>5 A. Have I ever purchased like for myself?</p> <p>6 Q. Related to travel with Mr. Giuliani.</p> <p>7 A. I'm sure I have. I can't recall a</p> <p>8 specific time, but yes, I have.</p> <p>9 Q. Okay. Do you know if you were</p> <p>10 reimbursed for that purchase?</p> <p>11 A. I do not recall, no.</p> <p>12 Q. Do you travel with Mr. Giuliani whenever</p> <p>13 he's traveling for business?</p> <p>14 A. I wouldn't say whenever, but a lot of</p> <p>15 the times.</p> <p>16 Q. Okay.</p> <p>17 MR. KNOBLETT: Maggie, could we</p> <p>18 introduce, it's labeled as Tab 17.</p> <p>19 THE WITNESS: May I take a couple</p> <p>20 bites?</p> <p>21 MR. KNOBLETT: Sure. This will take a</p> <p>22 second, so go ahead.</p> <p>23 (Tweet dated July 2, 2023, marked as</p> <p>24 Exhibit 5, as of this date.)</p> <p>25 (Tweet dated July 17, 2024, marked as</p>
<p style="text-align: right;">Page 91</p> <p>1 GOODMAN</p> <p>2 A. Plane. Plane, plane. I'm not sure</p> <p>3 exactly when Delta sends emails and when they</p> <p>4 don't.</p> <p>5 Q. With those emails could you identify</p> <p>6 which trips are with Mr. Giuliani?</p> <p>7 A. I believe so.</p> <p>8 Q. Okay. And you have access to those</p> <p>9 emails?</p> <p>10 A. Again, Tyler, I --</p> <p>11 Q. Mr. Goodman --</p> <p>12 A. I believe so. I believe so.</p> <p>13 Q. -- yes or no, please.</p> <p>14 A. Yes, I believe so.</p> <p>15 Q. Okay. And did you look at any of those</p> <p>16 emails?</p> <p>17 A. I didn't believe that was necessary and,</p> <p>18 again, I requested more time and explained why,</p> <p>19 and that's my answer. It's going to be my answer</p> <p>20 to all these questions about --</p> <p>21 Q. Okay. Let's continue.</p> <p>22 Have you purchased any of the travel</p> <p>23 yourself?</p> <p>24 A. Have I ever purchased an airline ticket</p> <p>25 on my own for myself?</p>	<p style="text-align: right;">Page 93</p> <p>1 GOODMAN</p> <p>2 Exhibit 6, as of this date.)</p> <p>3 THE WITNESS: Is this a new exhibit?</p> <p>4 MR. KNOBLETT: Yes, this is. It's</p> <p>5 Exhibit 6. It'll be marked as Exhibit 6.</p> <p>6 THE WITNESS: It's a good one.</p> <p>7 All right. I see it.</p> <p>8 MR. WOLKINSON: I only see Exhibit 5.</p> <p>9 THE WITNESS: Is Exhibit 5 the one</p> <p>10 with Bannon?</p> <p>11 MR. KNOBLETT: I'm sorry. It's marked</p> <p>12 Exhibit 5.</p> <p>13 MR. WOLKINSON: Okay.</p> <p>14 THE WITNESS: With Steve Bannon and</p> <p>15 Kari Lake, right?</p> <p>16 MR. KNOBLETT: Yeah.</p> <p>17 THE WITNESS: Yes, I see it.</p> <p>18 BY MR. KNOBLETT:</p> <p>19 Q. Do you recall when this -- do you</p> <p>20 recognize this document?</p> <p>21 A. Do I recognize my tweet where I say, "I</p> <p>22 stand with Steve Bannon"?</p> <p>23 Q. Yes.</p> <p>24 A. Yes, I do recognize that.</p> <p>25 Q. Do you know when this -- where this</p>

24 (Pages 90 - 93)

<p style="text-align: right;">Page 94</p> <p>1 GOODMAN</p> <p>2 photo was taken?</p> <p>3 A. I don't -- yeah, yeah, yeah. The</p> <p>4 mayor's residence in Florida.</p> <p>5 Q. Okay.</p> <p>6 A. I believe -- yeah. Just judging by</p> <p>7 that, yeah, yeah. Again, we do our show every</p> <p>8 night but I want to make sure I get that, yes,</p> <p>9 that was at his residence in Florida.</p> <p>10 Q. So are you always with Mr. Giuliani for</p> <p>11 his shows?</p> <p>12 A. For the 8 -- we start an 8 p.m. show.</p> <p>13 Tonight I believe is Episode 572. And yes,</p> <p>14 basically every single one of them I've been with</p> <p>15 him.</p> <p>16 Q. You just said you've been with him for</p> <p>17 nearly every one of his shows; is that right?</p> <p>18 A. The shows pertaining to America's Mayor</p> <p>19 Live, which is an 8 p.m. live stream. Not every</p> <p>20 single one, but yes, the vast majority.</p> <p>21 Q. Okay.</p> <p>22 MR. KNOBLETT: Let's do a different</p> <p>23 exhibit. Tab 17. Let me make sure it's</p> <p>24 the right one.</p> <p>25 Yeah, it should be.</p>	<p style="text-align: right;">Page 96</p> <p>1 GOODMAN</p> <p>2 A. Yeah, yeah, yeah.</p> <p>3 Q. You recognize this?</p> <p>4 A. I don't get the relevance.</p> <p>5 Q. Were you -- do you recall the context of</p> <p>6 this tweet?</p> <p>7 A. What do you mean "the context of this</p> <p>8 tweet"?</p> <p>9 Q. Why did you, why did you draft --</p> <p>10 A. Where is --</p> <p>11 Q. -- and send this tweet?</p> <p>12 A. Could we take a break, please? I have</p> <p>13 some questions for my lawyer.</p> <p>14 Q. No, I have a question pending.</p> <p>15 THE WITNESS: David, I'd like to take</p> <p>16 a break.</p> <p>17 MR. WOLKINSON: I understand that,</p> <p>18 Ted, and we should have taken a break</p> <p>19 before because you had asked for it. But</p> <p>20 as the counsel has said, you can't take a</p> <p>21 break in the middle of a question. So</p> <p>22 answer the question and then we'll take a</p> <p>23 break. I'm trying to look at the exhibit</p> <p>24 and read it myself right now. We're</p> <p>25 talking about Exhibit 6, right?</p>
<p style="text-align: right;">Page 95</p> <p>1 GOODMAN</p> <p>2 THE WITNESS: So why are you guys just</p> <p>3 showing me these now? Is this appropriate?</p> <p>4 Is this how these depositions work where I</p> <p>5 just see them as we go or were we entitled</p> <p>6 to these before this deposition?</p> <p>7 MR. WOLKINSON: Ted, that's something</p> <p>8 we'll discuss in private, that's not</p> <p>9 something to be discussed on the record.</p> <p>10 THE WITNESS: So I'm going to --</p> <p>11 MR. KNOBLETT: Okay. It should be</p> <p>12 open now. It's Exhibit 6.</p> <p>13 THE WITNESS: Yeah, so what is the</p> <p>14 relevance of all this? You're just</p> <p>15 bringing up embarrassing tweets of the</p> <p>16 mayor, is that what this is about?</p> <p>17 MR. KNOBLETT: No.</p> <p>18 BY MR. KNOBLETT:</p> <p>19 Q. Okay. Do you recognize -- do you</p> <p>20 recognize this document?</p> <p>21 A. I, I -- do I recognize what?</p> <p>22 Q. Have you opened Exhibit 6?</p> <p>23 A. Yeah.</p> <p>24 Q. It starts with "Mayor Rudy Giuliani</p> <p>25 appreciates everyone's --"</p>	<p style="text-align: right;">Page 97</p> <p>1 GOODMAN</p> <p>2 MR. KNOBLETT: Yes.</p> <p>3 Q. It says, "Mayor Giuliani appreciates</p> <p>4 everyone's concerns."</p> <p>5 A. Yes. The mayor, an 80-year-old man, had</p> <p>6 fallen because there's a dip on the convention</p> <p>7 floor of the RNC, a significant dip. Numerous</p> <p>8 people had tripped, and he had tripped, and I</p> <p>9 wanted to correct the record because the video was</p> <p>10 making the rounds, right. It's nobody wants to</p> <p>11 be, you know, viral video falling, right, that's</p> <p>12 not very graceful. And I think there was some --</p> <p>13 I wanted to correct the record on why he had</p> <p>14 fallen, right, so that there wasn't any, any</p> <p>15 question about why he had fallen. There was a</p> <p>16 significant maybe three-inch dip. I do not</p> <p>17 understand that design by the RNC to do it.</p> <p>18 And look, I wanted to be even more</p> <p>19 scathing towards the RNC and whoever decided to</p> <p>20 put a walkway with a three-inch -- with a big dip</p> <p>21 right where the chairs are. But obviously it was</p> <p>22 convention time and I didn't want to make a big</p> <p>23 deal about it, right. For political reasons I</p> <p>24 didn't want to put him on blast. I should have</p> <p>25 been -- but yeah, that was -- the purpose of that</p>


25 (Pages 94 - 97)

<p style="text-align: right;">Page 150</p> <p>1 GOODMAN</p> <p>2 A. You had mentioned that, yes.</p> <p>3 Q. Yeah. And one of those proceedings</p> <p>4 involves his Palm Beach condo?</p> <p>5 A. His residence in Florida, you did</p> <p>6 mention that, yes.</p> <p>7 Q. If I use the phrase "homestead," do you</p> <p>8 know what that refers to?</p> <p>9 A. Generally speaking, but I'm not an</p> <p>10 expert, I'm not a lawyer.</p> <p>11 Q. Okay. Okay. Let's --</p> <p>12 MR. KNOBLETT: Maggie, if you could</p> <p>13 put up Tab 21, and this will be Exhibit 11,</p> <p>14 I believe.</p> <p>15 (Calendar marked as Exhibit 11, as of</p> <p>16 this date.)</p> <p>17 THE WITNESS: This is a calendar. You</p> <p>18 guys got this sideways, though.</p> <p>19 MR. KNOBLETT: Yeah, I know.</p> <p>20 THE WITNESS: So I'd have to put my</p> <p>21 head like that. Is there any way you guys</p> <p>22 can flip that 90 degrees?</p> <p>23 MR. KNOBLETT: Let me see if this</p> <p>24 flips it for you.</p> <p>25 THE WITNESS: Do you get what I'm</p>	<p style="text-align: right;">Page 152</p> <p>1 GOODMAN</p> <p>2 THE WITNESS: It's a little gear,</p> <p>3 yeah, it's the second little icon.</p> <p>4 MR. KNOBLETT: You can rotate it</p> <p>5 clockwise.</p> <p>6 THE WITNESS: It starts in February, I</p> <p>7 do not see January on here.</p> <p>8 BY MR. KNOBLETT:</p> <p>9 Q. Okay. This is marked as Exhibit 11.</p> <p>10 Are you familiar with this document, Mr. Goodman?</p> <p>11 A. I am not.</p> <p>12 Q. I mean, a moment ago you said it was a</p> <p>13 calendar and the way you said that indicated you</p> <p>14 did recognize this.</p> <p>15 A. When did I say I recognized it. This is</p> <p>16 the first time I'm seeing it.</p> <p>17 Q. So it's your testimony that this is the</p> <p>18 first time you're seeing this document?</p> <p>19 A. You're now -- you're saying that I</p> <p>20 previously had referenced this document?</p> <p>21 Q. My mistake, Mr. Goodman.</p> <p>22 A. Okay.</p> <p>23 Q. When we opened up the document a few</p> <p>24 moments ago, you said, "Oh, this is a calendar,"</p> <p>25 and I --</p>
<p style="text-align: right;">Page 151</p> <p>1 GOODMAN</p> <p>2 saying?</p> <p>3 MR. KNOBLETT: Yeah. Do you see in</p> <p>4 the Exhibit Share there's kind of a toolbar</p> <p>5 next to the --</p> <p>6 THE WITNESS: Yeah.</p> <p>7 MR. KNOBLETT: -- exhibit.</p> <p>8 THE WITNESS: I see the toolbar, yeah.</p> <p>9 MR. KNOBLETT: Do you see the one</p> <p>10 that's like a file with the settings --</p> <p>11 THE WITNESS: Yeah.</p> <p>12 MR. KNOBLETT: -- like a gear?</p> <p>13 THE WITNESS: Yeah.</p> <p>14 MR. KNOBLETT: If you click that, you</p> <p>15 can --</p> <p>16 THE WITNESS: Got it. Okay. Perfect.</p> <p>17 MR. KNOBLETT: Okay.</p> <p>18 THE WITNESS: I appreciate your help</p> <p>19 on that.</p> <p>20 MR. KNOBLETT: No worries. We want,</p> <p>21 we want a clean record.</p> <p>22 MR. WOLKINSON: How do you do that</p> <p>23 again? Is it that one?</p> <p>24 MR. KNOBLETT: There's a toolbar near</p> <p>25 where the --</p>	<p style="text-align: right;">Page 153</p> <p>1 GOODMAN</p> <p>2 A. I said, "Oh, this is a calendar," yes,</p> <p>3 literally I'm just voicing that this is a</p> <p>4 calendar. Yeah, this is a physical calendar. I'm</p> <p>5 not saying I recognize it from any time before,</p> <p>6 I'm just saying, I spoke out loud that I'm looking</p> <p>7 at a calendar here.</p> <p>8 Q. So you don't recognize this document?</p> <p>9 A. I do not.</p> <p>10 Q. Okay. Do you -- was there any time when</p> <p>11 you were asked to collect dates for Mr. Giuliani's</p> <p>12 location?</p> <p>13 A. I may have assisted in collecting or</p> <p>14 like -- or like kind of, and I don't believe I</p> <p>15 ended up doing it, but, you know, looking at what</p> <p>16 days and where our show was, was done that day,</p> <p>17 right. So just, you know -- yeah, you know, we</p> <p>18 have our show five days a week, where was this</p> <p>19 show done each night. I believe I delegated that</p> <p>20 to some volunteer friends of ours and they may be</p> <p>21 the ones that put this together. I've never seen</p> <p>22 this.</p> <p>23 Q. Do you know who those friends are?</p> <p>24 A. I don't want to speculate on who it was.</p> <p>25 I mean, I probably could guess.</p>

<p style="text-align: right;">Page 154</p> <p>1 GOODMAN</p> <p>2 MR. CAMMARATA: No.</p> <p>3 A. I don't know for sure who ended up</p> <p>4 putting this together.</p> <p>5 MR. CAMMARATA: Please, don't guess at</p> <p>6 anything. It's a deposition.</p> <p>7 MR. KNOBLETT: Mr. Cammarata,</p> <p>8 Mr. Goodman can respond how he wants.</p> <p>9 MR. CAMMARATA: I understand that,</p> <p>10 but --</p> <p>11 THE WITNESS: Yeah, but it's his job.</p> <p>12 Q. Okay.</p> <p>13 A. I don't, I don't know who put this</p> <p>14 together.</p> <p>15 Q. Okay.</p> <p>16 MR. KNOBLETT: Maggie, could you bring</p> <p>17 up Tab 46.</p> <p>18 Actually, I think we introduced this</p> <p>19 already -- no, we didn't. So yeah, Tab 46,</p> <p>20 and this will be Exhibit 12.</p> <p>21 (Defendant Rudolph W. Giuliani's</p> <p>22 Pretrial Disclosures Pursuant to Federal</p> <p>23 Rule of Civil Procedure 26(a)(3) marked as</p> <p>24 Exhibit 12, as of this date.)</p> <p>25</p>	<p style="text-align: right;">Page 156</p> <p>1 GOODMAN</p> <p>2 multiple phones. I believe so, yes.</p> <p>3 Q. You said you have multiple phone; is</p> <p>4 that right?</p> <p>5 A. I only have one that I use for work, so</p> <p>6 yeah.</p> <p>7 Q. Okay. But you have a personal phone</p> <p>8 too; is that right?</p> <p>9 A. I don't really, I don't class -- I don't</p> <p>10 necessarily separate it like that, but yeah.</p> <p>11 Q. You have two phones; is that right?</p> <p>12 A. I have one working phone number, that's</p> <p>13 what I'll say.</p> <p>14 Q. All right. Do you communicate with --</p> <p>15 A. I take pictures. I have one working</p> <p>16 phone number.</p> <p>17 Q. Okay. Do you communicate with</p> <p>18 Mr. Giuliani on more than one phone?</p> <p>19 A. I do not.</p> <p>20 Q. How many physical phones do you have?</p> <p>21 A. I have old phones from years ago that</p> <p>22 aren't relevant to this.</p> <p>23 Q. How many --</p> <p>24 A. I have one phone.</p> <p>25 Q. How many --</p>
<p style="text-align: right;">Page 155</p> <p>1 GOODMAN</p> <p>2 BY MR. KNOBLETT:</p> <p>3 Q. Okay. This is somewhat of a long</p> <p>4 document. It's like 400 pages but we're only</p> <p>5 concerned with some of it.</p> <p>6 A. Okay.</p> <p>7 Q. This might take a moment. I need to</p> <p>8 find where we're talking about.</p> <p>9 Okay. If you scroll about, I don't</p> <p>10 know, 30 percent of the way down.</p> <p>11 A. Give me a page number.</p> <p>12 Q. Roughly page 91, and there'll be a</p> <p>13 series of photos.</p> <p>14 A. Yeah. Yes, those are pictures of our</p> <p>15 show. Like I said, I do recall, yeah, being asked</p> <p>16 to help kind of determine where our shows were</p> <p>17 done and so these -- that's what these pictures</p> <p>18 show.</p> <p>19 Q. Okay. Do you recognize these photos?</p> <p>20 A. I do.</p> <p>21 Q. Okay. Did you take these photos?</p> <p>22 A. I believe a lot of them I did.</p> <p>23 Q. And are these photos located on your</p> <p>24 phone?</p> <p>25 A. I believe my work -- well, I have</p>	<p style="text-align: right;">Page 157</p> <p>1 GOODMAN</p> <p>2 A. One physical phone.</p> <p>3 Q. Okay. How many phones are next to you</p> <p>4 right now?</p> <p>5 A. One phone.</p> <p>6 Q. Okay. Were these photos taken on that</p> <p>7 phone?</p> <p>8 A. I believe so, yes.</p> <p>9 Q. Okay. So you -- are those photos -- are</p> <p>10 these photos that we're looking at -- and you can</p> <p>11 scroll down if you want.</p> <p>12 A. Yes.</p> <p>13 Q. -- are they located on that phone today?</p> <p>14 A. I don't, I don't know, I'd have to look.</p> <p>15 Q. Okay. Is it your understanding that</p> <p>16 these photos show Mr. Giuliani's location at</p> <p>17 various times?</p> <p>18 A. I mean, any phone -- any photo is</p> <p>19 portraying -- can you please rephrase that?</p> <p>20 Q. Okay. So if you look at the first, if</p> <p>21 you look at the first photo here, it says January</p> <p>22 of 2024, you see that?</p> <p>23 A. February 8, 2024, yeah.</p> <p>24 Q. Okay. So what -- I'm going to ask a</p> <p>25 slightly different question.</p>

<p style="text-align: right;">Page 158</p> <p>1 GOODMAN</p> <p>2 What was the purpose of you collecting</p> <p>3 these photos?</p> <p>4 A. Originally, I --</p> <p>5 MR. WOLKINSON: Objection.</p> <p>6 A. I take pictures every day, a lot of</p> <p>7 days, right, in the general course of business.</p> <p>8 I'm very proud of the show I started with Mayor</p> <p>9 Rudy Giuliani, America's Mayor Live, and</p> <p>10 oftentimes I'll use these photos. A lot of these</p> <p>11 are photos of us on our set, right, and I'll use</p> <p>12 those as thumbnails for that day's show and I'll</p> <p>13 go on and post it. Or maybe I'll send it to</p> <p>14 somebody who's coming on our show so they can</p> <p>15 tweet it out, you know, X post it out to tease</p> <p>16 their audience, "Hey, I'm going to be on with</p> <p>17 Mayor Giuliani tonight." There's a lot of reasons</p> <p>18 why.</p> <p>19 I believe Mayor Giuliani is a historic</p> <p>20 figure and even just for posterity purposes I like</p> <p>21 to take pictures.</p> <p>22 Q. Okay. So my question wasn't really why</p> <p>23 you took the photos, my question -- and I'll</p> <p>24 rephrase it -- is why were --</p> <p>25 A. It was. That was the question.</p>	<p style="text-align: right;">Page 160</p> <p>1 GOODMAN</p> <p>2 it's the computer screen, right, and he's</p> <p>3 beyond -- you cut off part of the photo -- maybe I</p> <p>4 cut off part of the photo. But if you notice</p> <p>5 above, right, it's him, so it's like a creative</p> <p>6 shot. I'm getting a picture of the screen and</p> <p>7 then he's beyond the screen, and it's just</p> <p>8 something that I do each night for posterity</p> <p>9 purposes for the show, right.</p> <p>10 Q. When you take photos of Mr. Giuliani, do</p> <p>11 you only take those photos when you're in Florida</p> <p>12 with him?</p> <p>13 A. Do I only take -- what kind of question</p> <p>14 is that? What do you mean?</p> <p>15 MR. CAMMARATA: Objection.</p> <p>16 Q. Mr. Goodman, please answer. I can</p> <p>17 rephrase it, if you want.</p> <p>18 A. Yes.</p> <p>19 Q. Do you only take photos of Mr. Giuliani</p> <p>20 when you are in Florida with him?</p> <p>21 A. No.</p> <p>22 Q. Do you take photos of Mr. Giuliani when</p> <p>23 he's in New York?</p> <p>24 A. I do have photos of myself with Mayor</p> <p>25 Giuliani in New York just as I do in -- yes. Yes.</p>
<p style="text-align: right;">Page 159</p> <p>1 GOODMAN</p> <p>2 Q. My question, my question was why you</p> <p>3 collected these photos.</p> <p>4 A. Why did you collect, yeah. You got to</p> <p>5 collect the photo, you got to take the photo,</p> <p>6 right.</p> <p>7 Q. Let me rephrase.</p> <p>8 Were you asked to collect these photos</p> <p>9 by Mr. Giuliani's counsel?</p> <p>10 MR. CAMMARATA: Objection.</p> <p>11 A. I wasn't.</p> <p>12 Q. But these photos are from your phone?</p> <p>13 A. I believe most of them are, yes.</p> <p>14 Q. Okay. This set of photos -- let's</p> <p>15 scroll through them.</p> <p>16 So this first one's January 8, 2024.</p> <p>17 A. There's a lot prior. Yes.</p> <p>18 Q. There's about 30 of these.</p> <p>19 A. Okay.</p> <p>20 Q. Do you recognize taking this photo? Yes</p> <p>21 or no.</p> <p>22 A. Yes. I don't -- again, I take a lot of</p> <p>23 photos.</p> <p>24 Q. Do you recognize --</p> <p>25 A. I recognize the style. If you notice,</p>	<p style="text-align: right;">Page 161</p> <p>1 GOODMAN</p> <p>2 Q. What about New Hampshire?</p> <p>3 A. Presumably.</p> <p>4 Q. What about when you were in Wisconsin</p> <p>5 for the RNC?</p> <p>6 A. Yes.</p> <p>7 Q. And Chicago for the DNC, what about</p> <p>8 there?</p> <p>9 A. Yes.</p> <p>10 Q. Do you take photos of Mr. Giuliani when</p> <p>11 he's in D.C. for legal proceedings?</p> <p>12 A. Not inside the courtroom. If the judge</p> <p>13 says no camera, I don't, I'm not breaking the law</p> <p>14 there.</p> <p>15 Q. Have you taken --</p> <p>16 A. You're not getting me on that one,</p> <p>17 Tyler.</p> <p>18 Q. Have you taken a photo of Mr. Giuliani</p> <p>19 in D.C.?</p> <p>20 A. I believe so, yes.</p> <p>21 Q. Okay. So let's go through these photos.</p> <p>22 A. Okay.</p> <p>23 Q. So we did the first one there. Let's go</p> <p>24 down to the second one that says January 9th.</p> <p>25 A. I believe that is Harry from Harry's.</p>

<p style="text-align: right;">Page 162</p> <p>1 GOODMAN</p> <p>2 Q. And what is -- what is Harry's?</p> <p>3 A. I believe it's -- isn't it a nice</p> <p>4 establishment in New York and then he opened one</p> <p>5 here in West Palm Beach.</p> <p>6 Q. Do you know --</p> <p>7 A. Good guy.</p> <p>8 Q. Was this photo taken in New York?</p> <p>9 A. No. The photo was taken in Florida.</p> <p>10 That's at Harry's new location in Florida.</p> <p>11 Q. How do you know this was taken in</p> <p>12 Florida?</p> <p>13 A. I do believe I took this photo and I was</p> <p>14 at that meal.</p> <p>15 Q. Okay. So this -- okay. So you took</p> <p>16 this photo?</p> <p>17 A. I believe so, yes.</p> <p>18 Q. Okay. Let's move on to the next one.</p> <p>19 A. Okay.</p> <p>20 Q. That says, "Is Hunter Biden</p> <p>21 intentionally sabotaging, et cetera." Do you</p> <p>22 recognize this one?</p> <p>23 A. I don't think that was case looking</p> <p>24 back, by the way. Yeah, I guess I recognize it.</p> <p>25 Q. Did you take this photo?</p>	<p style="text-align: right;">Page 164</p> <p>1 GOODMAN</p> <p>2 questions.</p> <p>3 A. Okay. Okay.</p> <p>4 MR. CAMMARATA: What exhibit are you</p> <p>5 guys looking at because I can't see that</p> <p>6 photo?</p> <p>7 MR. KNOBLETT: Okay. It's Exhibit 46</p> <p>8 but it's quite a ways down. It's your,</p> <p>9 Mr. Cammarata --</p> <p>10 MR. CAMMARATA: Can you give us a page</p> <p>11 number?</p> <p>12 THE WITNESS: I'll look.</p> <p>13 MR. KNOBLETT: We're currently on 70.</p> <p>14 THE WITNESS: 69 or 70, yeah.</p> <p>15 MR. CAMMARATA: I have marked exhibits</p> <p>16 that only go up to Exhibit 12.</p> <p>17 MR. KNOBLETT: Yeah, this is</p> <p>18 Exhibit 12.</p> <p>19 THE WITNESS: Exhibit 12, page 70.</p> <p>20 MR. KNOBLETT: Mr. Cammarata, this is</p> <p>21 the disclosed witnesses that Mr. Giuliani</p> <p>22 filed on the 23rd.</p> <p>23 MR. CAMMARATA: Okay. Yeah. And</p> <p>24 you're on page 70 where the photos are?</p> <p>25 MR. KNOBLETT: Yes. Yes.</p>
<p style="text-align: right;">Page 163</p> <p>1 GOODMAN</p> <p>2 A. I think so.</p> <p>3 Q. But you can't say for sure?</p> <p>4 A. I mean, it's my style, right. I'm going</p> <p>5 to go ahead and guess, yeah, people don't take</p> <p>6 pictures like I do.</p> <p>7 Q. Okay. Let's move on to the next one,</p> <p>8 it's a photo of Mr. Giuliani in a blue shirt.</p> <p>9 A. Yep.</p> <p>10 Q. Do you recognize it?</p> <p>11 A. I recognize it and you can recognize the</p> <p>12 railing in the back, right, that's his Palm Beach</p> <p>13 residence.</p> <p>14 Q. Do you see at the top of the photo it</p> <p>15 sort of has like a toolbar that you'd see on a</p> <p>16 phone?</p> <p>17 A. Yeah.</p> <p>18 Q. Is that the same toolbar on your phone?</p> <p>19 A. I'd have to look, I believe so.</p> <p>20 Q. Okay. What type of phone do you have?</p> <p>21 A. Android.</p> <p>22 Q. Okay.</p> <p>23 A. I'm not trying to mislead you on this.</p> <p>24 I'm pretty sure --</p> <p>25 Q. No, I know, I know. I'm just asking</p>	<p style="text-align: right;">Page 165</p> <p>1 GOODMAN</p> <p>2 MR. CAMMARATA: All right. Let me --</p> <p>3 MR. KNOBLETT: And I apologize. I</p> <p>4 think I said Exhibit 46 earlier but this is</p> <p>5 Exhibit 12.</p> <p>6 MR. CAMMARATA: Yeah, I was going to</p> <p>7 say I'm missing --</p> <p>8 MR. KNOBLETT: We have internal</p> <p>9 numbering too.</p> <p>10 MR. CAMMARATA: Okay. Hold on.</p> <p>11 THE WITNESS: And this is confusing.</p> <p>12 You have a different numbering system</p> <p>13 internally.</p> <p>14 MR. KNOBLETT: Yeah, we don't know</p> <p>15 what order we're going to state.</p> <p>16 THE WITNESS: It gets confusing.</p> <p>17 MR. CAMMARATA: That's why you got to</p> <p>18 be real smart to work in the firm.</p> <p>19 MR. KNOBLETT: Yeah, we're on page 69</p> <p>20 or 70, so let me know when you're there,</p> <p>21 Mr. Cammarata.</p> <p>22 MR. CAMMARATA: Oh, 69. Exhibits --</p> <p>23 okay. Yeah, I got it.</p> <p>24 MR. KNOBLETT: Okay.</p> <p>25 MR. CAMMARATA: I'm there.</p>

<p style="text-align: right;">Page 218</p> <p>1 GOODMAN</p> <p>2 THE WITNESS: Why isn't this part of</p> <p>3 the record? Let the record show that I was</p> <p>4 cut off at the end here.</p> <p>5 THE VIDEOGRAPHER: Because there's no</p> <p>6 question pending.</p> <p>7 MR. KNOBLETT: Mr. Goodman.</p> <p>8 Mr. Goodman, you're represented by counsel.</p> <p>9 I did not ask a question.</p> <p>10 THE WITNESS: As a professional</p> <p>11 courtesy, Tyler, if you're allowed to make</p> <p>12 some comments at the end for the record,</p> <p>13 I'm asking out of professional courtesy --</p> <p>14 THE VIDEOGRAPHER: Actually, that's</p> <p>15 your counsel.</p> <p>16 THE WITNESS: I would also like to</p> <p>17 make some comments --</p> <p>18 MR. KNOBLETT: Mr. Goodman, no.</p> <p>19 THE WITNESS: -- for the record.</p> <p>20 Okay. And you're saying no.</p> <p>21 Let the record show that Tyler has</p> <p>22 declined my reasonable request to have a</p> <p>23 few comments made here.</p> <p>24 MR. KNOBLETT: Mr. Wolkinson, could</p> <p>25 you please control your client.</p>	<p style="text-align: right;">Page 220</p> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 I, JOSEPHINE H. FASSETT, a Registered</p> <p>5 Professional Reporter, Certified Court Reporter, and</p> <p>6 Notary Public, do hereby certify that the witness,</p> <p>7 whose stenographically recorded remote virtual</p> <p>8 deposition is hereinbefore set forth, was first duly</p> <p>9 sworn by me on the date indicated, and that the</p> <p>10 foregoing stenographically recorded remote virtual</p> <p>11 deposition is a true and accurate record of the</p> <p>12 testimony given by such witness.</p> <p>13 I FURTHER CERTIFY that I am not employed by nor</p> <p>14 related to any of the parties to this action by</p> <p>15 blood or marriage, and that I am in no way</p> <p>16 interested in the outcome of this matter.</p> <p>17 IN WITNESS WHEREOF, I have subscribed my hand</p> <p>18 this 2nd day of January, 2025.</p> <p>19</p> <p>20 </p> <p>21</p> <p>22 JOSEPHINE H. FASSETT, RPR, CCR</p> <p>23 NCRA License No. 32148</p> <p>24 CCR License No. 30XI00098400</p> <p>25 New York Notary Public</p> <p>New Jersey Notary Public</p>
<p style="text-align: right;">Page 219</p> <p>1 GOODMAN</p> <p>2 THE VIDEOGRAPHER: If there are no</p> <p>3 further questions, counsel, I will conclude</p> <p>4 the video recording for this proceeding.</p> <p>5 Here ends Media Unit No. 4. This</p> <p>6 concludes the video-recorded virtual remote</p> <p>7 deposition of Theodore Goodman taken by the</p> <p>8 plaintiffs on Tuesday, December 31, 2024.</p> <p>9 The time is 5:27 p.m. Eastern Standard</p> <p>10 Time.</p> <p>11 We are going off the record.</p> <p>12 (Off the record.)</p> <p>13 (Stenographic and video-recorded</p> <p>14 deposition adjourned 5:27 p.m.)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 221</p> <p>1</p> <p>2 C E R T I F I C A T I O N O F W I T N E S S</p> <p>3</p> <p>4 I, THEODORE C. GOODMAN, hereby certify that I</p> <p>5 have read the transcript of my testimony taken under</p> <p>6 oath in my stenographically recorded remote virtual</p> <p>7 deposition on December 31, 2024, and that the</p> <p>8 transcript is a true, complete and accurate record</p> <p>9 of my testimony, and that the answers on the record</p> <p>10 as given by me are true and correct, subject to the</p> <p>11 changes and/or corrections, if any, shown on the</p> <p>12 attached page.</p> <p>13</p> <p>14</p> <p>15 _____</p> <p>16 THEODORE C. GOODMAN</p> <p>17 Subscribed and sworn to before me this _____ day</p> <p>18 of _____, 2025.</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public State of _____</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>